

August 18, 2014

**VIA ECF**

The Honorable Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1610  
New York, NY 10007-1312

Re: *FHFA v. HSBC N. Am. Holdings Inc.*, No. 11 Civ. 6189 (S.D.N.Y.) (DLC);  
*FHFA v. Goldman, Sachs & Co.*, No. 11 Civ. 6198 (S.D.N.Y.) (DLC);  
*FHFA v. Ally Fin. Co.*, No. 11 Civ. 7010 (S.D.N.Y.) (DLC)

Dear Judge Cote:

We write on behalf of Plaintiff Federal Housing Finance Agency (“FHFA”) regarding two motions that FHFA electronically mailed to the Court on August 15, 2014, in connection with the subject actions: (1) Motion to Exclude the Opinions and Testimony of Defendants’ Expert Ethan Cohen-Cole, Ph.D. (*HSBC N. Am. Holdings Inc.* (Dkt. 899)); and (2) Motion to Exclude the Expert Testimony of Stephen G. Ryan (*HSBC N. Am. Holdings Inc.* (Dkt. 898); *Goldman, Sachs & Co.* (Dkt. 858); *Ally Fin. Co.* (Dkt. 999)).

As materials referenced in and attached to these submissions contain information designated by the parties as “Confidential” or “Highly Confidential” pursuant to the First Amended Protective Order, we request that the Court provide the parties until Friday, August 22 to meet and confer about proposed redactions, and jointly submit to the Court a list of proposed redactions on August 29. The parties have met and conferred, and the defendants in the subject actions consent to the proposed schedule.

Respectfully submitted,

/s/ Sascha N. Rand  
Sascha N. Rand  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010-1601  
(212) 506-1700

*Attorney for Plaintiff Federal Housing Finance  
Agency in FHFA v. Goldman, Sachs & Co. and  
FHFA v. HSBC N. Am. Holdings Inc.*

/s/ Christopher P. Johnson  
Christopher P. Johnson  
KASOWITZ, BENSON, TORRES &  
FRIEDMAN, LLP  
1633 Broadway  
New York, NY 10019  
(212) 506-1700

*Attorney for Plaintiff Federal Housing  
Finance Agency in FHFA v. Ally Fin. Co.*